

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JUAN LOPEZ,  
*on behalf of himself, FLSA Collective Plaintiffs  
and the Class,*

**Plaintiff,**

**Case No. 1:20-cv-09113 (LTS)(BCM)**

**-against-**

**NOTICE OF PLAINTIFF'S  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT  
PURSUANT TO FED. R. CIV. P. 56**

THERMO TECH MECHANICAL, INC.,  
GOWKARRAN BUDHU, and SHANTI BUDHU

**Defendants.**

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Please take notice that upon the accompanying Local Rule 56.1 Statement, Memorandum of Law and annexed materials, Plaintiff, by his undersigned attorneys, hereby moves under Rule 56 of the Federal Rules of Civil Procedure for partial summary judgment as described in the proposed Order attached hereto.

Pursuant to Rule A(2)(b)(ii) of the Individual Practices of Chief Judge Laura Taylor Swain, Plaintiff hereby certifies that the movant used its best effort but was unable to informally resolve the issues raised in this submission.

Dated: New York, New York

Respectfully submitted,

July 12, 2024

LEE LITIGATION GROUP, PLLC

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